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October 31, 2023

Hon. Vera M. Scanlon
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Courtroom 6C-S
Brooklyn, New York 11201

Re: *LaNasa, et al. v. Stiene*, 22-cv-5686

Your Honor:

This law firm represents the Plaintiffs in the above-captioned action. After consulting with counsel for the Defendants, this Joint Status Letter is submitted to the Court, pursuant to the Court's Order of July 27, 2023, regarding discovery.

Notwithstanding the existing Order that all fact discovery be completed by this date, this has not occurred. As of this date there is outstanding the Plaintiffs' Pre-Motion letter regarding compliance with the Plaintiffs' Interrogatory and Document Demands. See ECF No. 45 & 50 (just filed this date). Defendants' counsel has filed its response thereto (ECF No. 46), and the parties await the Court's scheduling of a pre-motion conference on this matter.

In addition, thereto, while a Proposed (Joint) Protective Order was submitted to Your Honor on September 11, 2023 (ECF No. 43), the Court has not signed it, as yet.

Further, neither of the parties have been deposed, nor have any of the Rule 26(a) named witnesses been deposed. Both parties aver they remain unable to adequately conduct any depositions, due to the broad scope of requested but still unproduced discovery.

Respectfully submitted,

/s/ Bernard V. Kleinman
Bernard V. Kleinman, Esq.
Attorney for Plaintiffs

cc: All counsel of record by ECF